

September 13, 2022

### General Comments

1. Instead of saying “no further investigation,” say “no further sampling is recommended at this time.” This is for buildings that do not have a mitigation system, had at least 2 rounds of wintertime sampling, and no exceedances above EPA’s action level of 2.0 ug/m3.
2. Suggested Section 6.0 language:

No additional indoor air sampling is recommended at this time. While we did not find evidence of TCE vapor intrusion, this building is close to nearby homes and school buildings where higher levels of TCE were detected and where mitigation systems were installed to prevent TCE vapors from accumulating indoors. Therefore, out of an abundance of caution, the indoor air should be reevaluated and possibly retested if any remodeling or significant renovations are planned for the building in the future. Certain types of renovations or structural changes can increase a building’s likelihood of being affected by vapor intrusion. For example, sealing crawlspace vents may reduce fresh air flow into the home. Drilling holes through the floor for a new toilet or telephone/internet cable can create a new pathway for vapors to enter the home. It is therefore recommended that the property owner discuss with Locus or EPA whether another round of sampling or other response activities would be appropriate based on significant renovations or remodeling.

Additional indoor air sampling may also be performed (and offered?) during EPA’s Five-Year Review of the Triple Site VI investigation if no indoor air sampling results were collected within the past five years. The next Five-Year Review for the Triple Site VI investigation will be in 2024.

### Specific Comments

1. Section 1.1, Page 8 – Instead of saying “no further investigation,” say “*no further sampling is recommended at this time. Current data indicate there is no evidence of unacceptable indoor air health risk related to contamination from the Superfund site.*”
2. Section 5.1, Page 16 – Since the TCE level of 1.4 ug/m3 was rejected by the lab due to quality control issues, this result should not be reported in the BSER. Reporting this result may be confusing to the property owner who may not have a clear understanding of QC issues and rejected data. It was excluded from Table 1 but refer to Comment #4.
3. Section 5.3, Page 19-20 – The text should include a brief sentence about possible PCE-containing indoor sources based on the residential interview with tenants at RES072 and RES231. Hobby or craft supplies or cleaners?
4. Section 6.0, Page 21 – See General Comment #2 above for suggested language (to be discussed further with EPA).
5. Table 1 – Change the “E” for RES097-PATH-1 to “R” since the value was rejected by the lab for QC issues. Then revise footnote “1” to state: “Result was rejected by the laboratory due to quality control issues.”
6. Table 2 – Should the Rejected result be reported in Table 2?

## 2019 OOU ASAOOC and NFA

- The OOC ASAOOC does not include the phrase “no further action.”
- The ASAOOC mentions “no further communication or action” for owners who are non-responsive to sampling or preemptive mitigation offers.
- The ASAOOC mentions “no further PRSC” which are the post-removal site controls. This is when Philips/EPA continues to track ownership of buildings, record access agreements, and maintaining a map for potential stakeholders in OOU properties and working with the City of Sunnyvale for disclosures and construction specifications. At some point, EPA/Philips will decide on “no further PRSCs.”
- The OOU Vapor Removal Work Plan is the only document that refers to the NFA status. A list of NFA properties is listed in **Table 3** of the WP. The decision framework flow chart (Figure 5 in WP) also refers to NFAs.
- EPA sent letters out to the property owners in Table 3 that are designated as NFA. APTIM can send EPA a copy of the letter and what language was used in these letters.